

JAP:DMP

M12-0123

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C., § 472)

JESSICA TATIANA LUCIO,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MAUREEN MURPHY, being duly sworn, deposes and says that she is a Special Agent with the United States Secret Service, duly appointed according to law and acting as such.

Upon information and belief, on or about February 3, 2012, within the Eastern District of New York, the defendant JESSICA TATIANA LUCIO, with intent to defraud, brought into the United States or kept in her possession or concealed a falsely made, forged, counterfeited or altered obligation or other security of the United States, to wit: approximately \$288,000 in counterfeit United States currency.

(Title 18, United States Code, Section 472).

The source of your deponent's information and the grounds for her belief are as follows:

1. On February 3, 2012, at approximately 6 a.m., the defendant JESSICA TATIANA LUCIO arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard TAM

Flight No. 8080 from Sao Paolo, Brazil. On February 2, 2012, LUCIO had flown from Uruguay to Sao Paolo on board TAM Flight No. 8047.

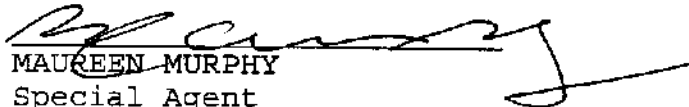
2. After her arrival at JFK Airport, the defendant JESSICA TATIANA LUCIO was subjected to a Customs and Border Protection inspection. LUCIO presented one black "President" luggage bag for inspection. She stated that the bag and its contents were hers. She presented a baggage claim ticket that matched the ticket number on the bag.

3. During the inspection, a CBP officer found that the luggage top flap on the black "President" bag felt unusually thick. The CBP officer probed the luggage top flap but the probe would not go through, indicating that an object was present in the lining of the bag. The CBP officer cut through the lining and observed what appeared to be United States currency. Upon closer examination, the currency appeared to be counterfeit because it was different in color and feel from United States currency.

4. Customs and Border Protection notified the Secret Service. I am trained in the examination and detection of counterfeit obligations of the United States, and I examined the above-described currency and determined that it was counterfeit.

5. A total of \$288,900 in counterfeit United States currency, all in \$100 denominations, was recovered from the black "President" bag.

WHEREFORE, your deponent respectfully requests that the defendant JESSICA TATIANA LUCIO be dealt with according to law.


MAUREEN MURPHY
Special Agent
U.S. Secret Service

Sworn to before me this
3rd day of February, 2012/

THE HONORABLE MARILYN D. GO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK